

The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

MILFORD WATER COMPANY

D.T.E. 05-97

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO MILFORD WATER COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Milford Water Company ("Milford" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

- 1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "provide complete and detailed documentation" means:
 - Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning

documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

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- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
- 7. Please serve a copy of the responses on Mary L. Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) John J. Geary, Hearing Officer; one (1) copy of the responses with Stephen Crowley, Analyst, Rates and Revenue Requirements Division; and one (1) copy of the responses with James Byrnes, Analyst, Rates and Revenue Requirements Division.
 - For Bulk Responses, one (1) copy should be submitted directly to John Geary.
- 8. All non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
- 9. Responses are due by the close of business (5:00 p.m.) Wednesday, February 1, 2006.

INFORMATION REQUESTS

- Please refer to the pre-filed testimony of Mr. Papuga at 3. Given that the proposed long-term debt ("Note") matures in ten years, explain in detail why the Company proposes to amortize the Note over 25 years. Include all supporting data, worksheets, and assumptions in your answer.
- Please refer to the pre-filed testimony of Mr. Papuga at 4-5. Explain in detail what permanent additions and betterments will be financed by the proposed Note. As part of this response, include the approximate cost of the contemplated additions and betterments to utility plant. Include all supporting data, worksheets, and assumptions in your answer.

First Set of Information Requests

- DTE 1-3 Please explain if proceeds derived from the Note will be used to finance any of Milford's short-term debt. If so, describe approximately what amount will be financed by the Note.
- DTE 1-4 Please refer to Att. 3 of the filing. Identify with specificity the assets that comprise the line item entitled "General Equipment."
- DTE 1-5 Please explain with supporting data how the requested financing complies with the requirements of G.L. c. 164, § 16.
- DTE 1-6 Does the Company contemplate a date when the proposed financing will be executed? If so, provide the anticipated date. If no date has been determined, discuss whether the imposition of a closing date by the Department would be appropriate.
- DTE 1-7 Provide all examples of significant benefits of the proposed financing to the Company and its customers.
- DTE 1-8 Provide the Company's forecast capital structure as of the end of 2006.
- DTE 1-9 Please refer to the pre-filed testimony of Mr. Papuga at 5-6. Explain in detail why the Company considers the Medway Cooperative Bank proposal to be "the most favorable in economic terms."